

Application No. 10/588,941  
Amendment dated August 3, 2009  
Reply to Office Action of February 2, 2009

Docket No.: 20513-00618-US1

**AMENDMENTS TO THE DRAWINGS**

The attached drawing sheet includes changes to Fig. 4.

Attachment:      Replacement sheet

### REMARKS

In view of the above amendment, applicant believes the pending application is in condition for allowance.

The drawings are objected to as failing to comply with 37 CFR 1.84(p)(4) because reference character "4" is shown twice in Fig 1. The accompanying correction to the drawing eliminates the error.

Claims 8-11 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The various insufficiencies pointed out by the Examiner have been corrected.

Claims 8-10 are rejected under 35 U.S.C. § 102(b) as being anticipated by Prior Art as Admitted by Applicant in the Specification, henceforth referred to as Applicant's Admitted Prior Art or "AAPA".

Claim 11 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicant's Admitted Prior Art (AAPA) as applied to claim 8, in view of Gul (US 6,457,857 B1).

Claim 15 has been added. It is based on Figure 4 and on the specification, page 11, lines 17 to 27. Figure 4 shows that the mechanism housing 13 has a bottom end having the same section as the upper end of the tubular shaped adapter 12, and that both ends are placed against one another (see the horizontal line between housing 13 and adapter 12). The description indicates that the bottom end part of the housing has a section of the same diameter as the adapter, and that the adapter and the housing are assembled end to end. Former Claim 9 indicates that the adapter and the housing are welded to one another (butt welded)

Claim 9 was rejected as being anticipated by the Prior Art Admitted by the Applicant. At the top of page 8 of the Office Communication, the examiner indicates that the limitation "the tubular shaped adapter and the mechanism housing are butt-welded" is a product by process limitation which is of little patentable weight. He states that it does not limit the invention further

than the feature "wherein the adapter and the mechanism housing are made in a single piece", which is mentioned in Claim 8.

The Applicant disagrees. A butt welding is a particular type of welding, well known by the man skilled in the art. Butt-welding two tubular parts involves butting respective ends of the parts against one another and welding said ends to one another (see for example the copy of the Oilfield Glossary, enclosed herewith). It is also indicated in The Free Dictionary that butt welding is creating a butt joint by welding, and that a butt joint is a joint made by fastening ends together without overlapping (see the pages enclosed). The Merriam-Webster dictionary gives a similar definition (copy enclosed). Accordingly, the feature "the tubular shaped adapter and the mechanism housing are butt-welded" does express structural differences between the invention and the state of the art.

In the AAPA, an end of the tubular shaped adapter 2 is threaded and is screwed into a matching tapped end of the mechanism housing 3 (see Fig 1 of the present application and page 9 lines 28 to 31). Then a seal is created by welding the facing surfaces of two sealing lips 2a, 3c, made respectively on the external surface of the tubular shaped adapter and on the mechanism housing (page 9, lines 31 to 33). It is indicated from page 2 line 30 to page 3 line 8, that the free end surface of the sealing lips come to face one another after the mechanism housing is screwed onto the end part of the tubular shaped adapter.

Clearly, in the AAPA the tubular shaped adapter is not butt welded with the mechanism housing, since the respective ends of the tubular shaped adapter and of the mechanism housing are not butted against one another without overlapping (the threaded end of the tubular shaped adapter is overlapped by the end of the mechanism housing). There is indeed a welding between respective parts of the adapter tube and of the mechanism housing (the sealing lips), but nothing suggests that said lips are butted against one another. The text of the present application suggests the contrary (page 3 lines 3 to 8: the free end surface of the sealing lips come to face one another after the mechanism housing is screwed onto the end part of the adapter). The expression "to face one another" suggest that there is a space between the two end surfaces.

The disadvantage of the connection between the tubular shaped adapter and the mechanism housing are identified in the present application, page 10, lines 1 to 6: the production of the weld between the sealing lips is awkward at least because of the position of the surfaces to be welded and the thinness of the sealing lips. It is further indicated on page 4 lines 5 to 14, that placing pressurized and high temperature water in contact with the internal part of the welded joint may cause corrosion.

In the invention, the adapter tube and the mechanism housing are connected by butt welding. Said connection method does not have the drawbacks above.

None of the prior art document suggests to replace the screwed connection between the adapter and the housing by a butt welded connection. The subject matter of Claim 8 is therefore not obvious.

If the examiner does not agree that the expression "butt welded" does define a structural limitation, the applicant offers to include in Claim 8 the features of the new Claim 15. Said features define the connection between the tubular-shaped adapter and the mechanism housing.

In view of the above, consideration and allowance are, therefore, respectfully solicited.

In the event the Examiner believes an interview might serve to advance the prosecution of this application in any way, the undersigned attorney is available at the telephone number noted below.

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The Director is hereby authorized to charge any fees, or credit any overpayment, associated with this communication, including any extension fees, to CBLH Deposit Account No. 22-0185, under Order No. 20513-00618-US1 from which the undersigned is authorized to draw.

Dated: August 3, 2009

Respectfully submitted,

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